

July 2001

JUDGMENT

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE,
Plaintiff,
vs.
C. O. LESTER,
Defendant.

FILED
HARRISBURG

AUG 27 2001

MARY E. D'ANDREA, CLERK

Per _____ DEPUTY CLERK

CIVIL Action No. 1:CV-01-0

U.S. DISTRICT Judge Rambo
Magistrate Judge Smyser

MOTION FOR ENLARGEMENT OF TIME

COMES NOW, the Plaintiff John Richard Jae, as Counsel in the above-entitled CIVIL ACTION, John Richard Jae, as a Layman Unlettered in the Arts & Sciences of the Law, Legal Procedures within the United States and now files his Motion for Enlargement of Time pursuant to Fed.R.Civ.P.6(b) & who, avers, deposes & states:

1. On June 22, 2001, the Plaintiff John Richard Jae, filed his Petition for Writ of Mandamus And Brf&In Support, herein this case.

2. Such Petition is still pending before this Court at this time.

3. Due to the fact that Plaintiff does not have his Case File/Paperwork, Legal Materials and Law Books and also does not have enough Paper nor Computer paper to prepare his Brf&In Opposition to Revoke Plaintiff's In

Faupens Status And Stay Of Proceedings and no large legal envelope to mail such to this Court and to Counsel for the Defendant, as stated in his Petition for Writ of Mandamus, herein, and, given that he needs the Court to order Clerks here to provide such to him first, and given the fact that

Court has not yet ruled on such Petition for Writ of Mandamus, he, this Plaintiff is unable to prepare, file or serve his Brf&In Opposition to Defendants Motion to Revoke Plaintiff's In Faupens Status And Stay of Proceedings, herein this case, by the present due date for such of August 22, 2001, and therefore, he requests an enlargement of time of thirty-

days from this date to & including September 24, 2001, in which to file & serve his Brf&In Opposition to Defendants Motion to Revoke Plaintiff's In Faupens Status And Stay of Proceedings, herein this case.

(W) HEREBY, Plaintiff John Richard Jae, prays that this Court will grant an enlargement of time of 30 days until September 24, 2001, in which to prepare & file his Brf&In Opposition to Defendants Motion to Revoke Plaintiff's In Faupens Status And Stay of Proceedings, herein this case.

RESPECTFULLY SUBMITTED,

John Richard Jae

CERTIFICATE OF SERVICE
PAE VS. LESTER,
CIVIL NO. 101-0041

I certify that on 8/23/01, I mailed to the person(s) below, a true and correct carbon copy of each of Plaintiff's Motion for Enlargement of Time and Plaintiff's Brief in Opposition to Defendants Motion for Stay of Proceedings And Enlargement of Time. Respondents shall file their brief in opposition to Plaintiff's Motion for Writ of Mandamus by U.S. 1st Class Mail, postage prepaid and addressed to:

Ms. Victoria S. Faginoff,
Assistant Counsel
Pennsylvania Department of Corrections,
Office of the Chief Counsel
SSUY Hey Drive
Camp Hill, PA. 17011

I certify that on 8/23/01, I gave the originals of the above-same documents to AT&T Office of the Pennsylvania Department of Corrections.

I certify under penalty of perjury & pursuant to 28 USC 1746 that the above, is true & correct.

Dated/Executed on:
23rd AUGUST 2001
At: Waynesburg, Pennsylvania



MR. JOHN RICHARD
#BQ3219
OCT-Green/SMV
195 Progress Drive
Waynesburg, PA. 15370
Plaintiff and Plaintiff's